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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

**JANE DOE #2,**

Plaintiff,

v.

**MARCUS JOHNSON, et al.,**

Defendants.

2:24-cv-1844 DJC AC P

**STIPULATION TO EXTEND TIME FOR  
DEFENDANTS GONZALEZ,  
MACOMBER, AND MONTES TO  
RESPOND TO PLAINTIFF'S FIRST  
AMENDED COMPLAINT**

~~PROPOSED~~ ORDER

Judge: Hon. Allison Claire  
Trial Date: None set  
Action Filed: July 1, 2024

**STIPULATION**

Pursuant to Federal Rule of Civil Procedure 6(b), the parties, by and through their attorneys of record, stipulate as follows:

1. Plaintiff Jane Doe #2 filed her operative First Amended Complaint on November 21, 2024 (ECF No. 20).
2. On December 6, 2024, the Court issued its screening order regarding the Second Amended Complaint and ordered Defendants L. Gonzalez, J. Macomber, and R. Montes

1 (Defendants)<sup>1</sup> to respond to the First Amended Complaint within 21 days of the filing of the  
2 order, making Defendants' initial deadline December 27, 2024 (ECF No. 21).

3 3. On December 26, 2024, the Court granted the parties' stipulated request to extend the  
4 time for Defendants to respond to the Second Amended Complaint until January 24, 2025. (ECF  
5 No. 24).

6 4. Since that extension, the parties have met and conferred regarding the claims and  
7 allegations in Plaintiff's First Amended Complaint and grounds for a motion to dismiss by  
8 Defendants, including but not limited to, a challenge to Plaintiff's standing to pursue injunctive  
9 relief and whether Plaintiff complied with the California Government Claims Act. Specifically,  
10 Defendants' counsel prepared and sent a letter to Plaintiff's counsel on January 17, 2025,  
11 outlining arguments for dismissal and the parties then conferred via video-conference on these  
12 grounds on January 22, 2025. In addition, the parties are currently considering whether to pursue  
13 early ADR, and Defendants have agreed to provide some documents under a protective order to  
14 Plaintiff so that the parties may more fully evaluate Plaintiff's claims. Accordingly, additional  
15 time to respond to the operative complaint is warranted to allow this exchange of information,  
16 including the preparation and entry of a protective order; for additional discussion of the viability  
17 of Plaintiff's claims against Defendants; and for the parties to more fully consider whether early  
18 ADR is appropriate for this matter.

19 5. In addition, Defendants' counsel has been occupied with other matters. Mr. Mark  
20 was out of the office from December 30, 2024 to January 10, 2025. During Mr. Mark's absence,  
21 Mr. Glantz was required to work on other pressing matters, including reviewing and responding  
22 to seven motions for remand in seven separate matters. And Mr. Glantz has been working to  
23 respond to an administrative subpoena in a matter involving the United States Department of  
24 Justice, which response is currently due January 24, 2025.

25 6. The parties have conferred and agree that additional time to respond to the First  
26 Amended Complaint until February 28, 2025, will allow the parties time to exchange documents,  
27

28 <sup>1</sup> The undersigned counsel does not represent Defendant Johnson.

conduct additional investigation concerning Plaintiff's claims, meet and confer further regarding Plaintiff's claims, and consider whether early ADR is appropriate for this matter.

7. Accordingly, the parties stipulate and respectfully request that Defendants L. Gonzalez, J. Macomber, and R. Montes shall have up to and including February 28, 2025 to respond to the First Amended Complaint.

**IT IS SO STIPULATED.**

Dated: January 24, 2025

/s/ Jenny C. Huang  
(as authorized January 24, 2025)  
Jenny C. Huang  
Attorney for Plaintiff, Jane Doe #1

Dated: January 24, 2025

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Attorney General of California  
ALICIA A. BOWER  
Supervising Deputy Attorney General  
ZACHARY GLANTZ  
Deputy Attorney General

/s/ Arthur B. Mark III

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Macomber, and R. Montes

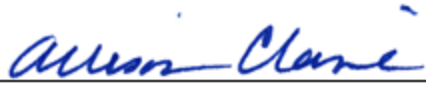
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~~PROPOSED~~ ORDER

Good cause appearing, the parties' stipulation is **GRANTED**. The deadline for Defendants Gonzalez, Macomber, and Montes to respond to Plaintiff's First Amended Complaint is hereby extended up to and including February 28, 2025.

**IT IS SO ORDERED.**

DATED: January 24, 2025

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE